

July 3, 2017

REDACTED – FOR PUBLIC INSPECTION**VIA ECFS**

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

RE: Form 481 – Carrier Annual Reporting Data Collection, 2017
WC Dockets No. 14-58

Dear Ms. Dortch:

Pursuant to sections 54.313(i) and 54.422(c) of the Commission's Rules, Shenandoah Telephone Company (the "Company") hereby submits a copy of its "FCC Form 481 - Carrier Annual Reporting Data Collection Form," as filed with the Universal Service Administrative Company. A copy is also being submitted to the appropriate state regulatory commission, as further required by sections 54.313(i) and 54.422(c).

Pursuant to the Protective Order adopted by the Commission in this proceeding, the Company requests confidential treatment for the financial information included in its report, as required by §54.313(f)(2), on the grounds that it is commercially sensitive information that is not normally released to the public. The Company also requests confidential treatment for its Five Year Service Quality Plan pursuant to sections 0.457 and 0.459 of the Commission's Rules. Information in support of the Company's request is attached hereto. In accordance with the Protective Order and the Commission's rules, one redacted copy has been submitted via ECFS, and one confidential non-redacted copy has been submitted on paper to the Secretary's Office.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,



K.C. Halm
Davis Wright Tremaine LLP

**REQUEST FOR CONFIDENTIALITY UNDER
47 C.F.R. SECTIONS 0.457(d) & 0.459**

Pursuant to Sections 0.457(d) and 0.459 of the Commission's rules, Shenandoah Telephone Company ("Shentel") requests confidentiality with respect to Shentel's FCC Form 481 submissions for Study Area Codes 190250 and 197251, which were submitted to the Universal Service Administrative Company (USAC) on June 30, 2017.

The following information is submitted pursuant to Section 0.459(b) of the Commission's rules:

- (1) Shentel requests that certain portions of FCC Form 481 for Study Area Codes 190250 and 197251 be given confidential treatment. Pursuant to 47 C.F.R. § 0.459(a)(2), Shentel has also submitted a redacted version of the FCC Form 481 via ECFS. Shentel requests that only the redacted version be made public.
- (2) Shentel's FCC Form 481 submissions include a progress report on its five year service quality improvement plan ("Progress Report"). Such improvement plan must provide maps of current and projected coverage; explanation of how universal service support was received; and how it was used to improve quality, coverage, or capacity.
- (3) The details contained in the Progress Report include confidential and proprietary commercial and financial information regarding, among other things, budgetary projections, and technical information regarding Shentel's facilities in Virginia, which is not customarily released to the public.
- (4) Broadband is subject to increasing competition from competitive local exchange carriers, cable television system operators, electric power utilities, fixed and mobile wireless service providers, and/or satellite carriers.
- (5) The Progress Report contains information which would not customarily be released to the public. The release to the public of proposed budgets and network build-out strategies would severely interfere with Shentel's ability to effectively negotiate contracts, and would be detrimental to Shentel's ability to compete in the marketplace.
- (6) In order to prevent unauthorized disclosure of the subject information, confidential treatment of the filing the FCC Form 481 with the Virginia State Corporation Commission has been sought.
- (7) The subject information is not available to the public and has only been released pursuant to reporting requirements of the Commission and Virginia State Corporation Commission's rules.
- (8) The Progress Report contains proprietary commercial information that Shentel intends to keep confidential. Because of the competitive sensitivity of the information contained in the Progress Report, Shentel seeks confidential treatment for a period of five (5) years from the date of submission to the Commission.
- (9) Not applicable.